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December 16, 2021

BY ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Constantinescu et al.*, No. 19 Cr. 651 (LTS)

Dear Judge Swain:

On behalf of defendants Ionela Constantinescu, Mircea Contantinescu, Cristian Costea, Peter Samolis, Iuliana Mihailescu and Florian Martin, and the Government we write to request a sixty-day adjournment of the upcoming status conference. Ms. Constantinescu and the above-named co-defendants are all out of custody.

The parties do not currently have any issues to raise with the Court. We are reviewing the voluminous discovery produced by the Government and exploring with our clients and the Government the possibility of pre-trial dispositions. Should the Court grant this request, we have no objection to an exclusion of time under the Speedy Trial Act through the re-scheduled date.

Respectfully submitted,

[Signatures on following page]

The foregoing adjournment request is granted. The Court hereby schedules the next conference in this matter for March 14, 2022, at 2:00pm. Speedy trial time has been excluded in this action through June 2022. Dkt. no. 942 resolved. SO ORDERED.

12/16/2021

/s/ Laura Taylor Swain, Chief USDJ

Hon. Laura Taylor Swain

Re: *United States v. Constantinescu et al., No. 19 Cr. 651 (LTS)*

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/s Ezra Spilke

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cc: All counsel of record by ECF